## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA ALEXANDRIA DIVISION

KENNETH HINTON,	)	
Plaintiff,	)	
v.	)	Civil Action No. 1:11cv00186-LO-TCE
	)	
BARCLAYS BANK DELAWARE,	)	
D.C. 1	)	
Defendant.	)	

## **DEFENDANT'S ANSWER**

DEFENDANT BARCLAYS BANK DELAWARE ("Barclays") hereby answers Plaintiff's Complaint as follows:

Each and every allegation asserted in Plaintiff's Complaint in its paragraph of Claim is denied.

Respectfully submitted this 1<sup>st</sup> day of March, 2011.

BARCLAYS BANK DELAWARE,

/s/
John W. Montgomery, Jr.
Virginia State Bar No. 37149
Counsel for Barclays Bank Delaware
MONTGOMERY & SIMPSON, LLP
2116 Dabney Road, Suite A-1
Richmond, Virginia 23230
Telephone: (804) 355-8744
Facsimile: (804) 355-8748

Email: jmontgomery@jwm-law.com

## **CERTIFICATE OF SERVICE**

I hereby certify that on the 1<sup>st</sup> day of March, 2011, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all parties and I hereby certify that I will mail the document by U.S. mail to the following non-filing user:

Kenneth Hinton 2200 Wilson Boulevard Suite 102-004 Arlington, Virginia 22201-3397

Dated: March 1, 2011.

/s/

John W. Montgomery, Jr.
Virginia State Bar No. 37149
Counsel for Barclays Bank Delaware
MONTGOMERY & SIMPSON, LLP
2116 Dabney Road, Suite A-1
Richmond, Virginia 23230
Telephone: (804) 355-8744

Facsimile: (804) 355-8748

Email: <u>imontgomery@jwm-law.com</u>